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2 MARICOPA COUNTY ATTORNEY

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8 Security Center Building
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14 Firm No. 00032000

15 Attorney for Defendants

16 **IN THE UNITED STATES DISTRICT COURT**
17 **FOR THE DISTRICT OF ARIZONA**

18 Marissa DeVault,

19 Plaintiff,

20 v.

21 Maricopa County; Sheriff Joe Arpaio;
22 Zandra S. Nocera, MD; Arcadia
23 Radiology; Dr. Gan; Dr. G. Gregorio; D.
24 Rogers RN; Theresa Mitchell-Lopen, MA;
25 Dr. V; Doctor #190; Dr. Gaskins; S.
26 Daniels RN; S. Perez RN; M. Johnson,
27 PA-C SC145; Spouses 1-10; and
28 Individuals, Entitites and Corporation I-X,

Defendants.

NO. _____

INDEX

...

- 1 Exhibit: (A) Contents of Superior Court File No. CV2011-093489
2 (B) Superior Court Notice of Removal to the Federal District
3 Court
4 (C) Supplemental Cover Sheet
5 (D) Civil Cover Sheet
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27 S:\COUNSEL\Civil\Matters\CP2011\DeVault v MC CJ2011-0056\Pleadings (E-filed)\Removal Docs\Notice of Removal Index.District Court.docx
28

EXHIBIT A

MICHAEL K. JEANES, CLERK
BY *Marshall* DEP

FILED

11 MAR 10 PM 4:51

Keith M. Knowlton, Attorney
9920 S. Rural Rd., Ste. 108
PMB #132
Tempe, AZ 85284-4100
(480) 755-1777
Attorney for Plaintiff
Keith M. Knowlton - SBN 011565

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR MARICOPA COUNTY

Marissa DeVault,

Plaintiff,

vs.

CV2011-093489

Maricopa County; Sheriff Joe
Arpaio; Zandra S. Nocera, MD;
Arcadia Radiology; Dr. Gan; Dr. G.
Gregorio; D. Rogers RN; Theresa
Mitchell-Lopen, MA; Dr. V; Doctor
#190; Dr. Gaskins; S. Daniels RN; S.
Perez RN; M. Johnson, PA-C SC145;
Spouses 1-10; and Individuals,
Entities and Corporation I-X,

Defendants.

CERTIFICATE OF COMPULSORY
ARBITRATION

The undersigned certifies that he or she knows the dollar limits and any other limitations set forth by the local rules of practice for the applicable superior court, and further certifies that this case is not subject to compulsory arbitration, as provided by Rules 72 through 76 of the Arizona Rules of Civil Procedure.

DATED this 10th day of March, 2011.

KEITH M. KNOWLTON, L.L.C.

By

Keith Knowlton
Keith Knowlton, SBN 011565
Attorney for Plaintiff

MICHAEL K. JEANES
 Clerk of the Superior Court
 By Vanessa Martinez, Deputy
 Date 03/10/2011 Time 16:52:49

Description	Amount
CASE# CV2011-093489	
CIVIL NEW COMPLAINT	301.00
TOTAL AMOUNT	301.00
Receipt# 21210647	

1 KEITH M. KNOWLTON, L.L.C.
 2 9920 S. Rural Road, Suite 108
 3 PMB# 132
 4 Tempe, Arizona 85284-4100
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 7 Attorney for Plaintiff
 8 **Keith M. Knowlton - SBN 011565**

9
 10
 11 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
 12 **IN AND FOR THE COUNTY OF MARICOPA**

13 **Marissa DeVault,**
 14 **Plaintiff,**
 15 **vs.**

16 **Maricopa County; Sheriff Joe Arpaio;**
 17 **Zandra S. Nocera, MD; Arcadia**
 18 **Radiology; Dr. Gan; Dr. G. Gregorio;**
 19 **D. Rogers RN; Theresa Mitchell-**
 20 **Lopen, MA; Dr. V; Doctor #190; Dr.**
 21 **Gaskins; S. Daniels RN; S. Perez RN;**
 22 **M. Johnson, PA-C SC145; Spouses I-**
 23 **10; and Individuals, Entities and**
 24 **Corporation I-X,**

25 **Defendants.**

CV2011-093489

COMPLAINT

(Medical Malpractice, Negligence and 42 U.S.C § 1983)

26 Plaintiff, Marissa DeVault, as and for her complaint against Defendants
 alleges as follows:

JURISDICTIONAL ALLEGATIONS

1. All of the acts, occurrences and events which comprise the subject matter of
 Plaintiffs' Complaint took place in Maricopa County, Arizona, and the Plaintiff was
 damaged in an amount sufficient to invoke the jurisdiction of this Court.

2. Plaintiff Marissa DeVault ("DeVault"), at all times relevant to the complaint
 was a pre-trial detainee of Maricopa County Jail system in Maricopa County, Arizona.

1 3. Defendant Sheriff Joe Arpaio ("Arpaio") is the Maricopa County Sheriff and
2 is being sued in his individual and official capacity. He is liable under respondeat
3 superior for the negligent and/or gross negligent acts of his employees.

4 4. Defendant, Maricopa County is body politic of the State of Arizona.
5 Maricopa County Correctional Health Services is a non-jural entity that is a
6 subdivision of Defendant Maricopa County. Maricopa County is respondeat superior
7 liable for the negligent/gross negligent acts of its employees.

8 5. Defendants Zandra S. Nocera is a radiologist licensed to practice medicine
9 in the state of Arizona and is an employee of Arcadia Radiology. Defendant Arcadia
10 Radiology is a business entity doing business in the State of Arizona and has
11 contracted with Maricopa County Correctional Health Services to provide radiology
12 services for inmates in the Maricopa County Jails.

13 6. Defendants Dr. Gan, Dr. G. Gregorio, D. Rogers RN, Theresa Mitchell-
14 Lopen, MA, Dr. V, Doctor #190, Dr. Gaskins, S. Daniels RN, S. Perez RN and M.
15 Johnson, PA-C SC145 (collectively referred to as "Medical Staff") are individuals who
16 at all times relevant to the Complaint were employees of Maricopa County
17 Correctional Health Services provided medical care and treatment to DeVault while
18 she was in the Maricopa County jail system. Defendant Zandra Nocera and the
19 Medical Staff are collectively referred to hereafter as the "Medical Defendants."

20 7. Defendants Spouse represents the unknown spouses of the Medical
21 Defendants and their names will be included upon discovering their names. Each
22 Medical Defendant and each fictitiously named Spouse Defendant were husband and
23 wife, and the Medical Defendants were acting for the benefit of the marital
24 community.

25 8. The fictitiously named Defendants in the caption to the Complaint are
26 individuals and entities who, on information and belief, committed acts or omissions or
caused events to occur that resulted in injury or damage to DeVault. Once the

1 identities of these Defendants are discovered, this Complaint shall be amended
2 accordingly.

3 9. All named Defendants are interrelated and are jointly and severally liable.

4 10. Each and every Defendant caused events to occur in Maricopa county
5 Maricopa County out of which this Complaint arose.

6 11. Plaintiff requests a jury trial.

7 12. This action is being brought under Arizona State tort law and pursuant to
8 42 U.S.C. § 1983 This Court further has jurisdiction under 28 USC 1331 and 28USC
9 1367. As the state and Federal claims derive from a common nucleus of operative
10 facts as to the state claims pending. There is a claim arising under Federal law and the
11 Federal claim is a substantial one.

12 **FACTUAL ALLEGATIONS**

13 13. Plaintiff incorporates all the above paragraphs as though fully set forth
14 herein.

15 14. DeVault incorporates herein by this reference her medical records in the
16 files of Maricopa County Correctional Health Services.

17 15. On February 9, 2009, DeVault was assaulted by unknown individual(s)
18 and received serious injuries. One of those injuries was a fractured ankle which
19 required surgery and the placement of pins and a plate to rebuild the ankle. She was
20 treated by Dr. Miller, an orthopedic surgeon at Scottsdale Osborne Hospital.

21 16. On February 20, 2009, DeVault was incarcerated and taken by law
22 enforcement from Scottsdale Osborne Hospital to the intake at the Maricopa County
23 4th Avenue Jail. She was then taken to the infirmary at the Maricopa County LBJ jail
24 (hereafter referred to as "Infirmary") to heal from her injuries.

1 17. While in the Infirmary, DeVault was under the medical care of Dr. Gan.
2 DeVault was concerned that her leg was not healing right and asked the nursing staff
3 and doctors if she had an infection.

4 18. On March 10, 2009, Dr. Gan documented her concern about having an
5 infection in his progress notes and documented redness and greenish stain on dressing.
6 On March 26, 2009, while conducting a physical examination of the leg, Dr. Gan
7 pushed on the red area and puss came out. When Dr. Gan discovered the infection
8 oozing out of the wound, he cleaned out the wound and had DeVault immediately
9 transferred to the hospital.

10 19. From March 10 to March 26, nothing was done to determine if the wound
11 had an infection and nothing was done to treat the infection. The infection was
12 allowed to grow untreated for an additional sixteen (16) days. DeVault should have
13 been transferred back to Scottsdale Osborne Hospital and placed under the care of Dr.
14 Miller at the first signs of the possibility of an infection in the wound so that she could
15 have received proper and timely diagnosis and treatment. Upon information and
16 belief, Dr. Gan did not have the time or the resources to properly diagnose and treat
17 DeVault in the Infirmary.

18 20. Under the care of Dr. Miller and other Doctors at Scottsdale Osborn
19 Hospital, DeVault received immediate emergency surgery and treatment with
20 antibiotics. DeVault remained in the Hospital until March 30, 2009 when she was
21 transferred back to the Infirmary.

22 21. While in the Infirmary, she received the antibiotics ordered by Dr. Miller
23 and the other Doctors at Scottsdale Osborn while her wounds again healed. DeVault
24 had a follow up appointment scheduled with Dr. Miller for May 20, 2009 to evaluate
25 her condition. An X-ray was taken on or about May 5, 2009 (documented as May 8,
26 2009) for the appointment with Dr. Miller.

1 22. On May 14, 2009, DeVault was released from the Infirmary at LBJ and
2 transferred into the general population at Estrella Jail. Dr. G. Gregorio M.D., #117,
3 discharged DeVault from the Infirmary solely because she had completed the course of
4 antibiotics. No tests were performed to determine if the infection had in fact been
5 resolved and the wound fully healed. Dr. Gregorio did this even though DeVault had
6 yet to see Dr. Miller to be evaluated by him. Further, Dr. Gregorio was covering that
7 day for Dr. Gan in the Infirmary and there is no evidence in the medical record that he
8 consulted with Dr. Gan, Dr. Miller or any other treating physician at Scottsdale Osborn
9 as to whether DeVault should be released from the Infirmary.

10 23. On May 20, 2009, DeVault was transferred from the jail to Dr. Miller for
11 her appointment. However, the x-rays that had been taken at the jail did not go with
12 her to the appointment. Without the x-rays, Dr. Miller was unable to determine if the
13 wound had healed and the infection eliminated. He rescheduled her appointment to
14 receive the x-rays.

15 24. On May 24, 2009, DeVault while walking, slipped in her cell and came in
16 contact with one of the table legs with her injured leg. DeVault knew immediately that
17 her injured leg had broken as a result of the contact. DeVault informed the nurse she
18 was concerned that her leg had fractured in the area where she had a bone infection.
19 The Nurse who saw DeVault on May 24, 2009 was D. Rogers, RN.

20 25. DeVault was not immediately taken for an x-ray or to a hospital for
21 treatment. The medical staff at Estrella Jail did not have DeVault's medical records
22 from the Infirmary regarding the severity of her infection and the treatment she had
23 previously received. Further, it was a holiday weekend and there were no doctors
24 available to consult with or to immediately see DeVault.

25 26. DeVault told every nurse and the Doctors about her prior infection and her
26 concern the break occurred because the infection was weakening her leg. The Nurses
and Doctors did not have her medical records from the Infirmary and because she was

1 an inmate, she was disbelieved and no action was taken. Based on her prior medical
2 condition, she should have immediately been taken to the hospital for evaluation and
3 treatment.

4 27. On May 25, 2009, DeVault was seen in medical by Theresa Mitchell-
5 Lopen, a Medical Assistant. The Medical Assistant documented that the mid calf was
6 "swollen; red, warm to the touch." DeVault was not seen by a Doctor nor transferred
7 to the hospital even though the Medical Assistant was told of the prior infection in that
8 area and the condition of the leg the Medical Assistant evaluated.

9 28. DeVault was not seen by a Doctor until May 26, 2009. The Doctor's
10 name is not legible but his number appears to be 190. Upon information and belief his
11 name is Dr. Gaskins. The Doctor "suspected refracture in compromised bone," not an
12 ongoing and continuing bone infection. The Doctor ordered an immediate x-ray to be
13 read by "Dr. V." Doctor 190 further found that it appeared DeVault had a new fracture
14 and ordered immobilization of the leg and a splint. At this time the infection was
15 growing and DeVault needed immediate emergency medical care and treatment.

16 29. The x-ray of the leg was taken on May 26, 2009 at the LBJ clinic. At this
17 point, DeVault was in a wheelchair and had only been given ibuprofen for the pain. A
18 guard at the jail was responsible for Plaintiff and forced her to stand and be searched
19 prior to the x-ray being taken. Even though the doctor had ordered the leg be
20 immobilized, she was forced by the Guard to stand on the leg. DeVault informed the
21 Guard of her condition, but the Guard did not care. In fact, as the Guard conducted the
22 search of Plaintiff, the Guard put her weight on Plaintiff's leg causing excruciating
23 pain. The Guard did this knowingly and intentionally.

24 30 On May 27, 2009 Plaintiff was seen at the medical unit at Estrella Jail for
25 a foot splint. A posterior sling was applied with two 6" ace wraps by Dr. M. Johnson,
26 CS145, a Physician Assistant-Certified.

1 31. In the Notes, Dr. Johnson indicated DeVault would be referred to her
2 original private "ortho." DeVault requested that she immediately be seen by an
3 orthopedic because of her previous condition and her concerns the infection did not go
4 away. Dr. Johnson said no. Dr. Johnson had the x-ray and she indicated the
5 information she had indicated she only had a broken leg. Again, Dr. Johnson did not
6 have DeVault's full medical chart showing her treatment for the infection and the
7 extent of her prior injuries.

8 32. On May 29, 2009, a Detention Officer came into DeVault's cell to conduct
9 a search. The Detention Officer indicated she was looking for drugs hidden in the
10 splint. The Detention Officer forced DeVault to sit on a stool and forced DeVault to
11 remove the splint. This should never, never have happened. If the splint was going to
12 be removed for a search, DeVault should have been taken to the clinic for a nurse or
13 doctor to remove it and then replace it.

14 33. DeVault unwrapped the splint and saw her leg; it was a bloody mess.
15 DeVault passed out from the sight of the wound. The infection was eating away of
16 DeVault's leg. The sight caused DeVault to faint and she hit the floor. The irony is that
17 the infection would have continued to eat at her leg and she would most likely have
18 lost her leg, if not her life, if the Detention Officer had not cruelly done what she did.

19 34. The Detention Officer immediately contacted medical where DeVault was
20 seen by a Nurse believed to be Myriam Diaz. The Nurse contacted "a provider" and the
21 Nurse was instructed to immediately send DeVault to the hospital at Maricopa County
22 Medical Center ("MCMC"). Again, if the medical unit at Estrella Jail had DeVault's
23 medical records, they would not have sent her to the MCMC emergency room but to
24 the Scottsdale Osborn where her treating physicians were located.

25 35. From May 14 to May 29, 2009, nothing was done to verify that the
26 infection was gone by the Doctors and Medical staff at the jails treating Plaintiff.
Plaintiff could not go to Scottsdale Osborne and the doctors who were treating her

1 condition outside of the jail, without permission and direction from the medical staff in
2 the jail. Further, at the first signs of a problem with the leg DeVault should have
3 immediately been sent to Scottsdale Osborne for treatment and evaluation.

4 36. An x-ray is a good diagnostic tool when there is a bone infection if there
5 are obvious changes (disintegration) in the bone from visible from the infection. The
6 x-rays taken on May 8, 2009 and May 24, 2009 were read by Zandra S. Nocera, MD of
7 Arcadia Radiology. Dr. Nocera had all the prior x-rays taken of DeVault and compared
8 them to the ones she was looking at. Dr. Nocera, read the May 8, 2009 x-ray on May
9 11, 2009 and called in the report to "Dr. V." Upon information and belief, in her report
10 she did not document any obvious changes from an infection.

11 37. However, in her May 27, 2009 report, she noted "interval pathological
12 fracture through one of the more proximal pin tracking of the tibia, presenting as an
13 interval change." Upon information and belief, this statement indicates fractures to the
14 bone arising from a disease, not injury. This report was stamped as reviewed by Dr.
15 Johnson with a handwritten date of May 29, 2009.

16 38. Upon information and belief, the x-rays of May 8, 2009 and the x-ray of
17 May 24, 2009, show obvious changes to the bone from the infection. These changes
18 should have been documented at that time in the radiology reports.

19 39. DeVault was taken to MCMC and about six (6) hours later she was
20 transferred to Scottsdale Osborne. She had a Mersa Infection and an antibiotic
21 resistant staph infection in the bone of her leg. Plaintiff was in the hospital to June 12,
22 2009 where she was in the Infirmary until April 19, 2009. During this time she had at
23 least six surgeries and given strong antibiotics through pick lines.

24 40. As a result of the infection, DeVault's leg is deformed. There are large
25 scars on her leg and about 1 and ½ inch of bone was removed from her leg. She has a
26 rod in her leg, the process of which injured her knee causing her to have to walk with a

1 cane. She has scars on her thigh where the Doctors took muscles from her thigh for
2 insertion in her leg.

3 41. As a result of the pick line, DeVault had blood clots and suffered a
4 pulmonary embolism. She currently has a blood clot in her lung which must be
5 monitored and she must take Coumadin (a blood thinner) for the rest of her life. The
6 infection further has been encapsulated in her bone. As a result, she will also have to
7 take strong antibiotics for the rest of her life.

8
9 **COUNT ONE**
10 **VIOLATION OF CIVIL RIGHTS**

11 42. The allegations set forth above are fully incorporated herein by this
12 reference.

13 43. In committing the above referenced actions and/or omissions, the Medical
14 Defendants, and each of them, acted under color of state law, and engaged in conduct
15 that was the proximate cause of a violation of Plaintiff's rights under the Fourth,
16 Eighth and Fourteenth Amendments to the Constitution of the United States of
17 America.

18 44. The Medical Defendants were deliberately indifferent to providing
19 Plaintiff with proper medical care and treatment for her serious injury. Upon
20 information and belief, this deliberate indifference resulted in injury and unnecessary
21 pain and suffering, as set forth above in the Factual Statement, all in an amount to be
22 proven at trial.

23 45. Upon information and belief, it is alleged that Defendant Maricopa
24 County has a history of and/or maintain a custom, policy, practice and/or procedure of
25 deliberate indifference to medical care and treatment of inmates and that such a policy
26 or practice was the proximate cause of a violation of Plaintiff's rights under the Fourth,

1 Eighth and/or Fourteenth Amendments to the Constitution of the United States of
2 America, including but not limited to her right not to be deprived of, or singled out for
3 disparate treatment regarding adequate medical treatment.

4 46. Upon information and belief, Maricopa County knowingly and
5 intentionally allows unconstitutional conditions to exist with respect to inmates'
6 medical needs.

7 47. There are significant delays in medical treatment. There is a sever lack of
8 resources which is primary 'systemic factor responsible for inadequate medical care
9 which the County has not remedied.

10 48. Under the 1999 settlement agreement with the DOJ, the County agreed to
11 hire sufficient general medicine nursing positions to provide adequate medical care to
12 inmates. As a result, an inmate's health status is likely to deteriorate while in the
13 custody of Maricopa County.

14 49. Upon information and belief, Defendant Maricopa County is aware of and
15 disregarded systemic and gross deficiencies in medical staffing and procedures and
16 that these deficiencies proximately caused the injuries to Plaintiff.

17 50. Upon information and belief, Defendant Maricopa County and/or Sheriff
18 Arpaio failed to properly train and/or supervise the Medical Defendants and detention
19 Officers in providing proper medical care and treatment and dealing with sick and
20 injured inmates in the jail.

21 51. As a result of the Defendants actions alleged above, and in violation of
22 Plaintiff's rights under Federal and State law, Plaintiff suffered damages, endured pain
23 and suffering, mental and emotional distress, and was caused to incur medical
24 expenses, all in an amount to be determined at trial.

25 52. Plaintiff is entitled to bring this cause of action against the Defendants
26 pursuant 42 USC s 1983.

53. Plaintiff is entitled to recover his attorneys' fees incurred in this matter pursuant to 42 U.S.C. § 1988(b).

54. Plaintiff is entitled to Punitive Damages.

COUNT TWO
NEGLIGENCE/GROSS NEGLIGENCE

55. The allegations set forth above are fully incorporated herein by this reference.

56. Maricopa County and/or the Medical Defendants, individually and/or through their agents and/or employees, intentionally, willfully and/or maliciously, grossly negligently and/or negligently failed to provide Plaintiff with appropriate medical care and treatment and the medical care and treatment provided fell below the applicable standard of care applicable to Plaintiff's medical condition set forth in the Factual Statement above.

57. As a direct and proximate result of the actions and or omissions of Maricopa County and the Medical Defendants, through its agents and/or employees, Plaintiff has sustained serious permanent injuries, incurred medical expenses, and will be forced in the future to expend additional sums for medical treatment and rehabilitation, has experienced extreme physical pain and suffering and extraordinary mental duress as a result of the actions of Defendants.

58. Defendant actions have proximately caused Plaintiff damages as specified above in an amount to be proven at trial.

59. Plaintiffs seek punitive damages.

60. Defendant Maricopa County, through its agents and/or employees, intentionally, willfully and/or maliciously, grossly negligently and/or negligently: (1) failed to provide Plaintiff with prompt emergency medical care and treatment; (2)

1 failed to have in place policies, procedures and/or staff whereby Plaintiff, as an inmate,
2 could receive prompt, accurate and professional evaluation of her medical condition
3 and quick, prompt and professional medical care and treatment; and/or (3) failed to
4 have on staff competent and fully trained medical personal who were trained to
5 evaluate the arm injury and trained to provide immediate and/or emergency medical
6 care and treatment to Plaintiff's arm.

7 61. As a direct and proximate result of the actions and or omissions of
8 Defendant Maricopa County, through its agents and/or employees, Plaintiff has
9 sustained serious permanent injuries, incurred medical expenses and will be forced in
10 the future to expend additional sums for medical treatment and rehabilitation, has
11 experienced extreme physical pain and suffering and extraordinary mental duress as a
12 result of Defendants' actions.

13 62. Upon information and belief, Defendant Maricopa County, failed to
14 properly train and/or supervise the Medical Defendants in providing proper medical
15 care and treatment to persons in the jail.

16 63. Upon information and belief, Defendant Maricopa County and Sheriff
17 Arpaio failed to properly train and/or supervise the detention officers who worked with
18 Plaintiff regarding how to handle injured inmates.

19 64. Defendants Maricopa County and/or Sheriff Arpaio are respondeat
20 superior liable for the negligent acts of their employees that caused injury to Plaintiff.

21 65. Defendants actions have proximately caused Plaintiff damages as
22 specified above in an amount to be proven at trial

23 WHEREFORE, based on the above, Plaintiff prays that judgment be
24 entered in her favor and against Defendants and each of them as follows:

25 1. For compensatory and consequential damages, including injury, future
26 medical expenses, pain and suffering, emotional distress, and such other damages as
may be proven at trial;

2. For attorneys fees incurred in this matter;
3. For punitive damages; and
4. For such other and further relief as the Court feels is just under the circumstances.

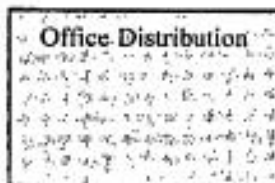
DATED this 10th day of March 2011.

KEITH M. KNOWLTON, L.L.C.

By: 

Keith M. Knowlton
Attorney for Plaintiff

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**SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY**

****FILED****
6/15/2011
Clerk of the Court

6/11/2011

COURT ADMINISTRATION

Ct. Admin
Deputy

Case Number: CV2011-093489

Marissa Devault

V.

Maricopa County

The Judge assigned to this action is the Honorable Karen Ann Potts

NOTICE OF INTENT TO DISMISS FOR LACK OF SERVICE

You are hereby notified that the complaint filed on 3/10/2011 is subject to dismissal pursuant to Rule 4 (i), Arizona Rules of Civil Procedure. The deadline for completing service is 7/8/2011. If no judge has extended time for completing service and no defendants have been served by this date, this case will be dismissed.

Superior Court of Maricopa County - integrated Court Information System
Endorsee Party Listing
Case Number: CV2011-093489

Party Name	Attorney Name	
Marissa Devault	Keith M Knowlton	Bar ID: 011565

ORIGINAL

MICHAEL K. JEANES, CLERK
BY *Molts* DEP.
FILED

**IN THE SUPRIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA**

11 JUN 30 AM 8:37

MARISSA DeVAULT,)	Case No. CV2011-093489
)	
Petitioner/Plaintiff,)	CERTIFICATE OF SERVICE
)	
Vs.)	
)	
Dr. Anna Hanson, Dr. #190. et al.)	
)	
Respondent/Defendant,)	

C/O Shanna Murphy, Maricopa County Clerk
Chris Dennison being fully qualified under ARCP (4)e to serve process within the State of Arizona and having been so appointed by Maricopa County Superior Court, did receive the following documents from : Kieth Knowlton, Esq. SBN 011565, (480) 755-1777.

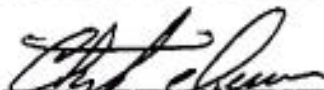
**SUMMONS and COMPLAINT.
CERTIFICATE OF COMPULSORY ARBITRATION.**

In each instance I served a true copy of each document listed above on those named below in the manner and time and place shown below.

Service was made upon: Shanna Murphy, On June 28, 2011, 10:35 AM
At: 234 North Central St. 5th fl Phoenix AZ., By hand in person at County Bldg.
Shanna is of age and discretion and works for Maricopa County Legal Dpmt..

I declare under penalty of perjury that the foregoing is true and correct

The undersigned being duly sworn, state, I am a registered officer of the Superior Court Of Arizona and duly approved as a Private Process Server, On 06-27-11, I received a true copy of each document above, I served the same on 06-28-11


Chris Dennison, 480-577-4509
P.S. #7050

Service Fee; \$10.00

ORIGINAL

MICHAEL K. JEANES, CLERK
BY *Molts* DEP
FILED

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA 11 JUN 30 AM 8:37
COUNTY OF MARICOPA

MARISSA DeVAULT,)	Case No. CV2011-093489
)	
Petitioner/Plaintiff,)	CERTIFICATE OF SERVICE
)	
Vs.)	
)	
SHERIFF JOE ARPAIO,)	
Marricopa County Sheriff, et al.)	
Respondent/Defendant,)	

C/O Sheriffs Office, Chad Wagneer. #8075.

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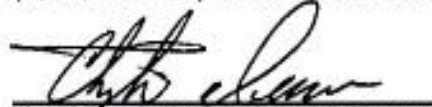
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CERTIFICATE OF COMPULSORY ARBITRATION.**

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Service was made upon: Chad Wagner, On June 27, 2011, 10:35 AM
At: 100 West Washington St., Phoenix AZ., By hand in person at Sheriffs Office.
Chad Wagner #8075 is of age and discretion and works for Sheriffs Legal Dpmt.

I declare under penalty of perjury that the foregoing is true and correct

The undersigned being duly sworn, state, I am a registered officer of the Superior Court Of Arizona and duly approved as a Private Process Server, On 06-27-11, I received a true copy of each document above, I served the same on 06-27-11


Chris Dennison, 480-577-4509
P.S. #7050

Service Fee; \$45.00

ORIGINAL

MICHAEL A. JEANES, CLERK
BY *Holts* DEP.
FILED

**IN THE SUPRIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA**

11 JUN 30 AM 8:37

MARISSA DeVAULT,)	Case No. CV2011-093489
)	
Petitioner/Plaintiff,)	CERTIFICATE OF SERVICE
)	
Vs.)	
)	
ZANDRA S. NOCERA, et al.)	
)	
Respondent/Defendant,)	

C/O Celene Bencomo, Office Manager
Chris Dennison being fully qualified under ARCP (4)e to serve process within the State of Arizona and having been so appointed by Maricopa County Superior Court, did receive the following documents from : Kieth Knowlton, Esq. SBN 011565, (480) 755-1777.

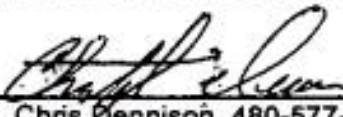
**SUMMONS and COMPLAINT.
CERTIFICATE OF COMPULSORY ARBITRATION.**

In each instance I served a true copy of each document listed above on those named below in the manner and time and place shown below.

Service was made upon: Celene Bencomo, On June 28, 2011, 11:50 AM
At: 4440 N. 36 th St. #110, Phoenix AZ., By hand in person at Arcadia Radiology
Celene is of age and discretion and works for Arcadia Radiology.
Celene said to have authority to accept such papers for Zandra S. Nocera.

I declare under penalty of perjury that the foregoing is true and correct

The undersighned being duly sworn, state, I am a registered officer of the Superior Court Of Arizona and duly approved as a Private Process Server, On 06-27-11, I received a true copy of each document above, I served the same on 06-28-11


Chris Dennison, 480-577-4509
P.S. #7050

Service Fee; \$25.00

ORIGINAL

MICHAEL K. JEANES, CLERK
BY *Holts* DEP
FILED

11 JUN 30 AM 8:37

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA**

MARISSA DeVAULT,)	Case No. CV2011-093489
)	
Petitioner/Plaintiff,)	CERTIFICATE OF SERVICE
)	
Vs.)	
)	
ARCADIA RADIOLOGY, et al.)	
)	
Respondent/Defendant,)	

C/O Celene Bencomo, Office Manager
Chris Dennison being fully qualified under ARCP (4)e to serve process within the State of Arizona and having been so appointed by Maricopa County Superior Court, did receive the following documents from : Kieth Knowlton, Esq. SBN 011565, (480) 755-1777.


**SUMMONS and COMPLAINT.
CERTIFICATE OF COMPULSORY ARBITRATION.**

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Service was made upon: Celene Bencomo, On June 28, 2011, 11:50 AM
At: 4440 N. 36 th St. #110, Phoenix AZ., By hand in person at Arcadia Radiology
Celene is of age and discretion and works for Arcadia Radiology.
Celene said to have authority to accept such papers for Arcadia

I declare under penalty of perjury that the foregoing is true and correct

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Chris Dennison, 480-577-4509
P.S. #7050

Service Fee; \$25.00

ORIGINAL

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BY *Holts* DEP
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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA**

11 JUN 30 AM 8:37

MARISSA DeVAULT,)	Case No. CV2011-093489
)	
Petitioner/Plaintiff,)	CERTIFICATE OF SERVICE
)	
Vs.)	
)	
DR. GASKINS, et al.)	
)	
Respondent/Defendant,)	

C/O Shanna Murphy, Maricopa County Clerk
Chris Dennison being fully qualified under ARCP (4)e to serve process within the State of Arizona and having been so appointed by Maricopa County Superior Court, did receive the following documents from : Kieth Knowlton, Esq. SBN 011565, (480) 755-1777.

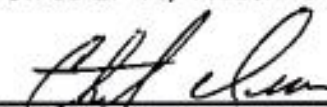
**SUMMONS and COMPLAINT.
CERTIFICATE OF COMPULSORY ARBITRATION.**

In each instance I served a true copy of each document listed above on those named below in the manner and time and place shown below.

Service was made upon: Shanna Murphy, On June 28, 2011, 10:35 AM
At: 234 North Central St. 5th fl Phoenix AZ., By hand in person at County Bldg.
Shanna is of age and discretion and works for Maricopa County Legal Dpmt..

I declare under penalty of perjury that the foregoing is true and correct

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Chris Dennison, 480-577-4509
P.S. #7050

Service Fee; \$10.00

ORIGINAL

MICHAEL A. JEANES, CLERK
BY *Molts* DEP
FILED

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA

11 JUN 30 AM 8:37

MARISSA DeVAULT,)	Case No. CV2011-093489
)	
Petitioner/Plaintiff,)	CERTIFICATE OF SERVICE
)	
Vs.)	
)	
M. JOHNSON, PA-C SC145, et al.)	
)	
Respondent/Defendant,)	

C/O Shanna Murphy, Maricopa County Clerk
Chris Dennison being fully qualified under ARCP (4)e to serve process within the State of Arizona and having been so appointed by Maricopa County Superior Court, did receive the following documents from : Kieth Knowiton, Esq. SBN 011565, (480) 755-1777.

SUMMONS and COMPLAINT.
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P.S. #7050

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IN THE SUPRIOR COURT OF THE STATE OF ARIZONA 11 JUN 30 AM 8:37
COUNTY OF MARICOPA

MARISSA DeVAULT,)	Case No. CV2011-093489
)	
Petitioner/Plaintiff,)	CERTIFICATE OF SERVICE
)	
Vs.)	
)	
S. PEREZ RN. et al.)	
)	
Respondent/Defendant,)	

C/O Shanna Murphy, Maricopa County Clerk
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DEP

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA

MARISSA DeVAULT,)	Case No. CV2011-093489
)	
Petitioner/Plaintiff,)	CERTIFICATE OF SERVICE
)	
Vs.)	
)	
Dr. Gan et al.)	
)	
Respondent/Defendant,)	

C/O Shanna Murphy, Maricopa County Clerk
Chris Dennison being fully qualified under ARCP (4)e to serve process within the State of Arizona and having been so appointed by Maricopa County Superior Court, did receive the following documents from : Kieth Knowlton, Esq. SBN 011565, (480) 755-1777.

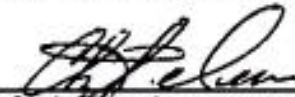
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Chris Dennison, 480-577-4509
P.S. #7050

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MICHAEL R. JEANES, CLERK
BY *Molts* DEP
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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA JUN 30 AM 8:37
COUNTY OF MARICOPA

MARISSA DeVAULT,)	Case No. CV2011-093489
)	
Petitioner/Plaintiff,)	CERTIFICATE OF SERVICE
)	
Vs.)	
)	
Dr. G. GREGORIO, et al.)	
)	
Respondent/Defendant,)	

C/O Shanna Murphy, Maricopa County Clerk
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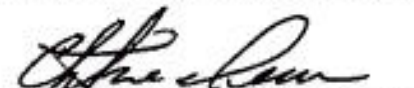
**SUMMONS and COMPLAINT.
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Chris Dennison, 480-577-4509
P.S. #7050

Service Fee; \$10.00

ORIGINAL

MICHAEL A. JEANES, CLERK
BY *Holts* DEP
FILED

IN THE SUPRIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA

JUN 30 AM 8:37

MARISSA DeVAULT,

Petitioner/Plaintiff,

Vs.

THERESA M.-LOPEN, MA. et al.

Respondent/Defendant,

Case No. CV2011-093489

CERTIFICATE OF SERVICE

C/O Shanna Murphy, Maricopa County Clerk
Chris Dennison being fully qualified under ARCP (4)e to serve process within the State of Arizona and having been so appointed by Maricopa County Superior Court, did receive the following documents from : Kieth Knowlton, Esq. SBN 011565, (480) 755-1777.

**SUMMONS and COMPLAINT.
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Shanna is of age and discretion and works for Maricopa County Legal Dpmt..

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Chris Dennison
Chris Dennison, 480-577-4509
P.S. #7050

Service Fee; \$10.00

ORIGINAL

MICHAEL K. JEANES, CLERK
BY *Holts* DEP.
FILED

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA

11 JUN 30 AM 8:37

MARISSA DeVAULT,)	Case No. CV2011-093489
)	
Petitioner/Plaintiff,)	CERTIFICATE OF SERVICE
)	
Vs.)	
)	
MARICOPA COUNTY,)	
In the State of Arizona, et al.)	
Respondent/Defendant,)	

C/O Laverna Wilson. Maricopa County Clerk
Chris Dennison being fully qualified under ARCP (4)e to serve process within the State of Arizona and having been so appointed by Maricopa County Superior Court, did receive the following documents from : Kieth Knowlton, Esq. SBN 011565, (480) 755-1777.

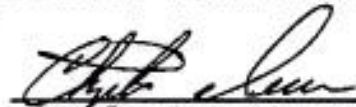
**SUMMONS and COMPLAINT.
CERTIFICATE OF COMPULSORY ARBITRATION.**

In each instance I served a true copy of each document listed above on those named below in the manner and time and place shown below.

Service was made upon: Laverna Wilson, On June 27, 2011, 10:48 AM
At: 301 West Jefferson St., Phoenix AZ, By hand in person at County Bldg.
Laverna Wilson is of age and discretion and works for Maricopa County Legal Dpmt..

I declare under penalty of perjury that the foregoing is true and correct

The undersigned being duly sworn, state, I am a registered officer of the Superior Court Of Arizona and duly approved as a Private Process Server, On 06-27-11, I received a true copy of each document above, I served the same on 06-27-11


Chris Dennison, 480-577-4509
P.S. #7050

Service Fee; \$45.00

MICHAEL A. JEANES, CLERK
BY *Holts* DEP.
FILED

11 JUN 30 AM 8:37

1 KEITH M. KNOWLTON, L.L.C.
2 9920 S. Rural Road, Suite 108
3 PMB# 132
4 Tempe, Arizona 85284-4100
5 (480) 755-1777
6 FAX (480) 471-8956
7 Attorney for Plaintiff
8 Keith M. Knowlton - SBN 011565

ORIGINAL

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

7 IN AND FOR THE COUNTY OF MARICOPA

8 Marissa DeVault,

9 Plaintiff,

10 vs.

11 Maricopa County; Sheriff Joe Arpaio;
12 Zandra S. Nocera, MD; Arcadia
13 Radiology; Dr. Gan; Dr. G. Gregorio;
14 D. Rogers RN; Theresa Mitchell-
15 Lopen, MA; Dr. V; Doctor #190; Dr.
16 Gaskins; S. Daniels RN; S. Perez RN;
17 M. Johnson, PA-C SC145; Spouses 1-
18 10; and Individuals, Entities and
19 Corporation I-X,

20 Defendants.

Case No: CV2011-093489

SUMMONS

IF YOU WANT THE ADVICE OF A LAWYER, YOU MAY
WISH TO CONTACT THE LAWYER REFERRAL SERVICE AT
802-257-4434 OR ONLINE AT WWW.LAWYERSFINDERS.ORG
LRS IS SPONSORED BY THE MARICOPA COUNTY
BAR ASSOCIATION.

21 TO: Dr. Gaskins,

22 YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S

23 ATTORNEY Keith M. Knowlton, 9920 S. Rural Road, Suite 108, PMB# 132, Tempe, Arizona

24 85284-4100 an answer to the complaint which is herewith served upon you, within 20 days after

25 service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by

26 default will be taken against you for the relief demanded in the complaint. You must also file your

answer with the Clerk of this Court within a reasonable period of time after service.

1
2 CLERK

DATE

3
4 (BY) DEPUTY CLERK

JUN 24 2011



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6 MICHAEL K. JEANES, CLERK
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MICHAEL K. JEANES, CLERK
 BY *Holts* DEP
 FILED

11 JUN 30 AM 8:37

1 KEITH M. KNOWLTON, L.L.C.
 2 9920 S. Rural Road, Suite 108
 3 PMB# 132
 4 Tempe, Arizona 85284-4100
 5 (480) 755-1777
 6 FAX (480) 471-8956
 7 Attorney for Plaintiff
 8 Keith M. Knowlton - SBN 011565

ORIGINAL

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

7 IN AND FOR THE COUNTY OF MARICOPA

8 Marissa DeVault,

Case No: CV2011-093489

9 Plaintiff,

10 vs.

SUMMONS

11 Maricopa County; Sheriff Joe Arpaio;
 12 Zandra S. Nocera, MD; Arcadia
 13 Radiology; Dr. Gan; Dr. G. Gregorio;
 14 D. Rogers RN; Theresa Mitchell-
 15 Lopen, MA; Dr. V; Doctor #190; Dr.
 16 Gaskins; S. Daniels RN; S. Perez RN;
 17 M. Johnson, PA-C SC145; Spouses 1-
 18 10; and Individuals, Entities and
 19 Corporation I-X,

20 Defendants.

IF YOU WANT THE ADVICE OF A LAWYER, YOU MAY
 WISH TO CONTACT THE LAWYER REFERRAL SERVICE AT
 602-257-4434 OR ONLINE AT WWW.LAWYERSFINDERS.ORG
 LRS IS SPONSORED BY THE MARICOPA COUNTY
 BAR ASSOCIATION.

21 TO: Arcadia Radiology,

22 YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S

23 ATTORNEY Keith M. Knowlton, 9920 S. Rural Road, Suite 108, PMB# 132, Tempe, Arizona

24 85284-4100 an answer to the complaint which is herewith served upon you, within 20 days after

25 service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by

26 default will be taken against you for the relief demanded in the complaint. You must also file your

answer with the Clerk of this Court within a reasonable period of time after service.

1
2 CLERK

JUN 24 2011

DATE

M. Jeanes



3
4 (BY) DEPUTY CLERK

MICHAEL K. JEANES, CLERK

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MICHAEL K. JEANES, CLERK
BY *Holts* DEP

FILED

11 JUN 30 AM 8:37

KEITH M. KNOWLTON, L.L.C.
9920 S. Rural Road, Suite 108
PMB# 132
Tempe, Arizona 85284-4100
(480) 755-1777
FAX (480) 471-8956
Attorney for Plaintiff
Keith M. Knowlton - SBN 011565

ORIGINAL

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

Marissa DeVault,

Plaintiff,

vs.

Maricopa County; Sheriff Joe Arpaio;
Zandra S. Nocera, MD; Arcadia
Radiology; Dr. Gan; Dr. G. Gregorio;
D. Rogers RN; Theresa Mitchell-
Lopen, MA; Dr. V; Doctor #190; Dr.
Gaskins; S. Daniels RN; S. Perez RN;
M. Johnson, PA-C SC145; Spouses 1-
10; and Individuals, Entities and
Corporation I-X,

Defendants.

Case No: CV2011-093489

SUMMONS

IF YOU WANT THE ADVICE OF A LAWYER, YOU MAY
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602-257-4434 OR ONLINE AT WWW.LAWYERSFINDERS.ORG
LRS IS SPONSORED BY THE MARICOPA COUNTY
BAR ASSOCIATION.

TO: Zandra S. Nocera,

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S

ATTORNEY Keith M. Knowlton, 9920 S. Rural Road, Suite 108, PMB# 132, Tempe, Arizona

85284-4100 an answer to the complaint which is herewith served upon you, within 20 days after

service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by

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1
2 CLERK

JUN 24 2011

DATE

Michael K. Jeanes

3
4 (BY) DEPUTY CLERK

MICHAEL K. JEANES, CLERK



1035
6-27-11MICHAEL N. JEANES, CLERK
BY *Holts* DEP.
FILED

11 JUN 30 AM 8:36

KEITH M. KNOWLTON, L.L.C.
9920 S. Rural Road, Suite 108
PMB# 132
Tempe, Arizona 85284-4100
(480) 755-1777
FAX (480) 471-8956
Attorney for Plaintiff
Keith M. Knowlton - SBN 011565

ORIGINAL

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

Marissa DeVault,

Plaintiff,

vs.

Maricopa County; Sheriff Joe Arpaio;
Zandra S. Nocera, MD; Arcadia
Radiology; Dr. Gan; Dr. G. Gregorio;
D. Rogers RN; Theresa Mitchell-
Lopen, MA; Dr. V; Doctor #190; Dr.
Gaskins; S. Daniels RN; S. Perez RN;
M. Johnson, PA-C SC145; Spouses 1-
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Defendants.

Case No: CV2011-093489

SUMMONS

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602-257-4434 OR ONLINE AT WWW.LAWYERSFINDERS.ORG
LRS IS SPONSORED BY THE MARICOPA COUNTY
BAR ASSOCIATION.

TO: Sheriff Joe Arpaio,

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S

ATTORNEY Keith M. Knowlton, 9920 S. Rural Road, Suite 108, PMB# 132, Tempe, Arizona
85284-4100 an answer to the complaint which is herewith served upon you, within 20 days after
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answer with the Clerk of this Court within a reasonable period of time after service.

JUN 24 2011

[Signature]
DATE



CLERK

MICHAEL K. JEANES, CLERK

(BY) DEPUTY CLERK

MICHAEL K. JEANES, CLERK
BY *Molts* DEP
FILED

11 JUN 30 AM 8:36

1 KEITH M. KNOWLTON, L.L.C.
2 9920 S. Rural Road, Suite 108
3 PMB# 132
4 Tempe, Arizona 85284-4100
5 (480) 755-1777
6 FAX (480) 471-8956
7 Attorney for Plaintiff
8 Keith M. Knowlton - SBN 011565

ORIGINAL

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

7 IN AND FOR THE COUNTY OF MARICOPA

8 Marissa DeVault,

9 Plaintiff,

10 vs.

11 Maricopa County; Sheriff Joe Arpaio;
12 Zandra S. Nocera, MD; Arcadia
13 Radiology; Dr. Gan; Dr. G. Gregorio;
14 D. Rogers RN; Theresa Mitchell-
15 Lopen, MA; Dr. V; Doctor #190; Dr.
16 Gaskins; S. Daniels RN; S. Perez RN;
17 M. Johnson, PA-C SC145; Spouses 1-
18 10; and Individuals, Entities and
19 Corporation I-X,

20 Defendants.

Case No: CV2011-093489

SUMMONS

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602-257-4434 OR ONLINE AT WWW.LAWYER8FINDERS.ORG
LRS IS SPONSORED BY THE MARICOPA COUNTY
BAR ASSOCIATION.

21 TO: Theresa Mitchell-Lopen, MA,

22 YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S

23 ATTORNEY Keith M. Knowlton, 9920 S. Rural Road, Suite 108, PMB# 132, Tempe, Arizona

24 85284-4100 an answer to the complaint which is herewith served upon you, within 20 days after

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JUN 24 2011 
DATE

CLERK

(BY) DEPUTY CLERK

MICHAEL K. JEANES, CLERK



MICHAEL A. JEANES, CLERK
BY *Holts* DEP

FILED

11 JUN 30 AM 8:36

KEITH M. KNOWLTON, L.L.C.
9920 S. Rural Road, Suite 108
PMB# 132
Tempe, Arizona 85284-4100
(480) 755-1777
FAX (480) 471-8956
Attorney for Plaintiff
Keith M. Knowlton - SBN 011565

ORIGINAL

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

Marissa DeVault,

Plaintiff,

vs.

Maricopa County; Sheriff Joe Arpaio;
Zandra S. Nocera, MD; Arcadia
Radiology; Dr. Gan; Dr. G. Gregorio;
D. Rogers RN; Theresa Mitchell-
Lopen, MA; Dr. V; Doctor #190; Dr.
Gaskins; S. Daniels RN; S. Perez RN;
M. Johnson, PA-C SC145; Spouses 1-
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Corporation I-X,

Defendants.

Case No: CV2011-093489

SUMMONS

IF YOU WANT THE ADVICE OF A LAWYER, YOU MAY
WISH TO CONTACT THE LAWYER REFERRAL SERVICE AT
602-257-4434 OR ONLINE AT WWW.LAWYERSFINDERS.ORG
LRS IS SPONSORED BY THE MARICOPA COUNTY
BAR ASSOCIATION.

TO: Dr. G. Gregorio,

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S

ATTORNEY Keith M. Knowlton, 9920 S. Rural Road, Suite 108, PMB# 132, Tempe, Arizona
85284-4100 an answer to the complaint which is herewith served upon you, within 20 days after
service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by
default will be taken against you for the relief demanded in the complaint. You must also file your
answer with the Clerk of this Court within a reasonable period of time after service.

1
2 CLERK

JUN 24 2011

DATE

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3
4 (BY) DEPUTY CLERK

MICHAEL K. JEANES, CLERK



MICHAEL K. JEANES, CLERK
BY *Molts* DEP

FILED

11 JUN 30 AM 8:37

1 KEITH M. KNOWLTON, L.L.C.
 2 9920 S. Rural Road, Suite 108
 3 PMB# 132
 4 Tempe, Arizona 85284-4100
 5 (480) 755-1777
 FAX (480) 471-8956
 Attorney for Plaintiff
 Keith M. Knowlton - SBN 011565

ORIGINAL

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

Marissa DeVault,

Case No: CV2011-093489

Plaintiff,

vs.

11 Maricopa County; Sheriff Joe Arpaio;
 12 Zandra S. Nocera, MD; Arcadia
 13 Radiology; Dr. Gan; Dr. G. Gregorio;
 14 D. Rogers RN; Theresa Mitchell-
 15 Lopen, MA; Dr. V; Doctor #190; Dr.
 Gaskins; S. Daniels RN; S. Perez RN;
 M. Johnson, PA-C SC145; Spouses I-
 10; and Individuals, Entities and
 Corporation I-X,

SUMMONS

Defendants.

TO: Dr. Anna Hanson (Doctor #190),

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S

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MICHAEL K. JEANES, CLERK

CLERK

JUN 27 2011
DATE

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If you would like legal advice from a lawyer,
contact the Lawyer Referral Service at

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or

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7 Attorney for Plaintiff
8 **Keith M. Knowlton - SBN 011565**

ORIGINAL

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

8 **Marissa DeVault,**

9 **Plaintiff,**

10 **vs.**

11 **Maricopa County; Sheriff Joe Arpaio;**
12 **Zandra S. Nocera, MD; Arcadia**
13 **Radiology; Dr. Gan; Dr. G. Gregorio;**
14 **D. Rogers RN; Theresa Mitchell-**
15 **Lopen, MA; Dr. V; Doctor #190; Dr.**
16 **Gaskins; S. Daniels RN; S. Perez RN;**
17 **M. Johnson, PA-C SC145; Spouses 1-**
18 **10; and Individuals, Entities and**
19 **Corporation I-X,**

20 **Defendants.**

Case No: CV2011-093489

SUMMONS

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21 **TO: M. Johnson, PA-C SC145,**

22 **YOU ARE HEREBY SUMMONED** and required to serve upon PLAINTIFF'S

23 ATTORNEY Keith M. Knowlton, 9920 S. Rural Road, Suite 108, PMB# 132, Tempe, Arizona

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2 9920 S. Rural Road, Suite 108
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4 Tempe, Arizona 85284-4100
5 (480) 755-1777
6 FAX (480) 471-8956
7 Attorney for Plaintiff
8 Keith M. Knowlton - SBN 011565

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

7 IN AND FOR THE COUNTY OF MARICOPA

8 Marissa DeVault,

9 Plaintiff,

10 vs.

11 Maricopa County; Sheriff Joe Arpaio;
12 Zandra S. Nocera, MD; Arcadia
13 Radiology; Dr. Gan; Dr. G. Gregorio;
14 D. Rogers RN; Theresa Mitchell-
15 Lopen, MA; Dr. V; Doctor #190; Dr.
16 Gaskins; S. Daniels RN; S. Perez RN;
17 M. Johnson, PA-C SC145; Spouses 1-
18 10; and Individuals, Entities and
19 Corporation I-X,

20 Defendants.

Case No: CV2011-093489

SUMMONS

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21 TO: Dr. Gan,

22 YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S

23 ATTORNEY Keith M. Knowlton, 9920 S. Rural Road, Suite 108, PMB# 132, Tempe, Arizona

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MICHAEL K. JEANES, CLERK

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4 Tempe, Arizona 85284-4100
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6 FAX (480) 471-8956
7 Attorney for Plaintiff
8 **Keith M. Knowlton - SBN 011565**

ORIGINAL

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

8 **Marissa DeVault,**

9 **Plaintiff,**

10 vs.

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12 **Zandra S. Nocera, MD; Arcadia**
13 **Radiology; Dr. Gan; Dr. G. Gregorio;**
14 **D. Rogers RN; Theresa Mitchell-**
15 **Lopen, MA; Dr. V; Doctor #190; Dr.**
16 **Gaskins; S. Daniels RN; S. Perez RN;**
17 **M. Johnson, PA-C SC145; Spouses 1-**
18 **10; and Individuals, Entities and**
19 **Corporation I-X,**

20 **Defendants.**

Case No: CV2011-093489

SUMMONS

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LRS IS SPONSORED BY THE MARICOPA COUNTY
BAR ASSOCIATION.

21 TO: **S. Perez RN,**

22 **YOU ARE HEREBY SUMMONED** and required to serve upon PLAINTIFF'S

23 ATTORNEY Keith M. Knowlton, 9920 S. Rural Road, Suite 108, PMB# 132, Tempe, Arizona

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Keith M. Knowlton, Attorney
 9920 S. Rural Rd., Ste. 108
 PMB #132
 Tempe, AZ 85284-4100
 (480) 755-1777
 Attorney for Plaintiff
 Keith M. Knowlton – SBN 011565

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR MARICOPA COUNTY

Marissa DeVault,

Plaintiff,

vs.

Case No: CV2011-093489

**Maricopa County; Sheriff Joe
 Arpaio; Zandra S. Nocera, MD;
 Arcadia Radiology; Dr. Gan; Dr. G.
 Gregorio; D. Rogers RN; Theresa
 Mitchell-Lopen, MA; Dr. V; Doctor
 #190; Dr. Gaskins; S. Daniels RN; S.
 Perez RN; M. Johnson, PA-C SC145;
 Spouses 1-10; and Individuals,
 Entities and Corporation I-X,**

Defendants.

**MOTION FOR EXTENSION OF TIME
 TO SERVE DEFENDANTS**

Plaintiff, through counsel undersigned, pursuant to Rule 4, ARCP, respectfully request the Court extend the time to serve the Defendants D. Rogers RN and S. Daniels RN. All other Defendants have been timely served. These two Defendants were employees of Maricopa County Correctional Health Services but no longer work for the County. Their addresses have not been provided by Maricopa County and Plaintiff is attempting to locate them at this time. Plaintiff has not been able to locate these individuals from the licensing bodies or any other available source. Plaintiff will need an additional thirty (30) days to locate these Defendants for service.

WHEREFORE, for the reasons set forth above, Plaintiff respectfully requests the Court extend the deadline to serve the complaint for thirty (30) days from July 8, 2011.

1 RESPECTFULLY SUBMITTED this 7th day of June, 2011.

2
3 KEITH M. KNOWLTON, L.L.C.

4 /s/ Keith Knowlton

5 By

6 Keith Knowlton, SBN 011565
7 Attorney for Plaintiff
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